

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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In re:	:	
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THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> ,	:	(Jointly Administered)
	:	
Debtors. ¹	:	
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**JOINT INFORMATIVE MOTION REGARDING OCTOBER 28-29, 2020 HEARING
ON JOINT MOTION OF PSA CREDITORS PURSUANT TO SECTION 312
OF PROMESA AND SECTION 105 OF THE BANKRUPTCY CODE
TO IMPOSE DEADLINES FOR PLAN OF ADJUSTMENT**

To the Honorable United States District Court Judge Laura Taylor Swain:

The PSA Creditors,² The Commonwealth of Puerto Rico (the “Commonwealth” or the “Debtor”), as Title III debtor, by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), the Puerto Rico Fiscal Agency and Financial Advisory

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233 (LTS)) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the *Joint Motion of PSA Creditors pursuant to Sections 312 of the PROMESA and Section 105 of the Bankruptcy Code to Impose Deadlines with respect to a Plan of Adjustment* [ECF No. 14478].

Authority (“AAFAF”), Ambac Assurance Corporation (“Ambac”), the Official Committee of Unsecured Creditors (the “Committee”), and certain holders of bonds issues by the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (the “ERS Bondholders,” and collectively with the PSA Creditors, the Oversight Board, AAFAF, Ambac, and the Committee, the “Parties”)³ respectfully submit this joint informative motion pursuant to the Court’s *Order Regarding Procedures for October 28-29, 2020, Omnibus Hearing* [ECF No. 14619] (the “Procedures Order”) and respectfully state as follows:

1. The foregoing Parties will appear telephonically at the October 28, 2020 hearing on the *Joint Motion of PSA Creditors pursuant to Sections 312 of the PROMESA and Section 105 of the Bankruptcy Code to Impose Deadlines for Plan of Adjustment* [ECF No. 14478] (the “PSA Creditors’ Motion”) as well as any and all objections, responses, statements, joinders, and replies to the PSA Creditors Motion.

2. The following individuals may appear and speak on behalf of the Parties:

- a. LCDC: Susheel Kirpalani of Quinn Emanuel Urquhart & Sullivan, LLP [ECF No. 14478 & 14666]
- b. GO Group: Mark Stancil of Willkie Farr & Gallagher LLP [ECF No. 14478 & 14666]
- c. Constitutional Debt Group: Joseph Palmore of Morrison & Foerster LLP [ECF No. 14478 & 14666]
- d. QTCB Group: Kurt Mayr of Morgan, Lewis & Bockius LLP [ECF No. 14478 & 14666]
- e. Oversight Board: Martin Bienenstock and/or Brian Rosen of Proskauer Rose LLP [ECF No. 14547]
- f. AAFAF: Peter Friedman of O'Melveny & Myers LLP [ECF No. 14558]

³ The ERS Bondholders are identified in the *Statement of Certain ERS Bondholders Regarding the Joint Motion of PSA Creditors pursuant to Sections 312 of the PROMESA and Section 105 of the Bankruptcy Code to Impose Deadlines with respect to a Plan of Adjustment* [ECF No. 14664].

- g. Ambac: Atara Miller of Milbank LLP [ECF No. 14559]
- h. Committee: Luc Despins of Paul Hastings LLP [ECF No. 14576]
- i. ERS Bondholders: Benjamin Rosenblum of Jones Day [ECF No. 14664]

3. The Parties request that the Court allocate 60 minutes for a hearing on the PSA Creditors' Motion. The Parties have agreed to allocate such time as follows, listed in the order in which the Parties shall present:

- a. Movants Opening Argument: 25 minutes
 - i. LCDC: 10 minutes
 - ii. GO Group: 5 minutes
 - iii. Constitutional Debt Group: 5 minutes
 - iv. QTCB Group: 5 minutes
- b. Objecting Parties' Argument: 30 minutes
 - i. Oversight Board: 12 minutes
 - ii. AAFAF: 6 minutes
 - iii. Ambac: 5 minutes
 - v. Committee: 5 minutes
 - vi. ERS Bondholders: 2 minutes
- c. Movants' Rebuttal Argument: 5 minutes
 - i. LCDC: 5 minutes

WHEREFORE, the Parties respectfully request that the Court take notice of the above.

DATED: October 22, 2020
San Juan, Puerto Rico

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel for the parties of record.

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